



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JUN 24 2014

Federal Emergency Management Agency
Sandy Recovery Office
ATTN: EHP Group
307 Middletown Lincroft Road
Lincroft, New Jersey 07738

RE: Passaic Valley Sewerage Authority Floodwall and On-Site power System Construction,
Environmental Assessment

Dear Sir or Madam:

The Environmental Protection Agency (EPA) has reviewed the Federal Emergency Management Agency's (FEMA) Environmental Assessment dated May 2014 on the proposed Passaic Valley Sewerage Authority Floodwall and On-Site Power System Construction. The facility is located at the intersection of Wilson and Doremus Avenues in the City of Newark, New Jersey. During Hurricane Sandy, the sewerage facility experienced a twelve-foot tidal storm surge from Newark Bay, which inundated the facility and electrical power was lost. The purpose of the proposed project is to protect the facility if/when another large storm enters the area.

The preferred alternative is to construct a floodwall around the facility's critical infrastructure, re-work site drainage, construct two stormwater control pump stations and install a centralized standby power system to run the facility in the event of a disruption to the electrical power grid. EPA has the following comments:

- The proposed floodwall is to be constructed at a height of "six to twelve feet." Why is there such a discrepancy in the values of the height of the wall? While the document states that the wall would be designed to mitigate the impact of a 500-year flood, EPA recommends that the background information used for this calculation be part of the environmental assessment, and a definitive height discussed.
- It is EPA's understanding that much of the facility is built on fill material. Will the wall construction account for this material, and not be subject to seepage or capillary action underneath?
- EPA suggests that the document be accompanied by a simple information piece as to how floodwalls work, and how the flood gates will be constructed. For example, the document does not have an easily understandable diagram of where the flood gates will be, or how they will operate during an event.
- While EPA assumes that FEMA has modelled the flow of water diverted by walling this facility, these results and calculations should be made available in the environmental assessment to facilitate the analysis of cumulative effects for future projects in the area.

General Conformity

- The emissions are shown as annual emissions, not by calendar year, though the table notes imply that construction would occur over multiple years. While this result may be conservative, there is no accompanying explanation as to why it was reported this way. Please provide calendar year emissions or a justification as to why the analysis was presented as annual emissions.
- The analysis assumes Tier 3 engines on all construction equipment, but there's no justification in the document for this assumption. While Tier 3 engines have been in production since 2009, there is no commitment by the project sponsor to ensure that the fleet of construction equipment has model year 2009 or newer engines. This is therefore not a conservative assumption and would require an environmental performance commitment.

Wetlands

- While EPA understands that the applicant has received a Letter of Interpretation – Line Verification from the New Jersey Department of Environmental Protection (NJDEP), we are concerned that the Army Corps of Engineers may have wetlands jurisdiction as there is a connecting waterway to the bay. EPA recommends that the applicant contact the New York District Army Corps of Engineers to verify NJDEP jurisdiction.

Thank you for the opportunity to comment. If you have any questions, please call Lingard Knutson of my staff at (212) 637-3747.

Sincerely,

A handwritten signature in cursive script, appearing to read "Grace Musumeci".

Grace Musumeci, Chief
Environmental Review Section